

FILED

UNITED STATES DISTRICT COURT

2022 APR 20 PM 1:12

for the

District of _____

Division _____

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

03-22-0286

Case No.

(to be filled in by the Clerk's Office)

William Ray Leggett

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

metroblitan Development

and Housing Agency

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

William Ray Leggett

Street Address

301 28th Ave North Apt: 310

City and County

Nashville Davidson

State and Zip Code

Tennessee 37203

Telephone Number

629-867-4858

E-mail Address

NONE

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

metropolitan Development and
Housing Agency
Property Rental
303 Foster St
Nashville Davidson
Tennessee 37207
615-252-3674

Defendant No. 2

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Defendant No. 3

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Defendant No. 4

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Losing a Place to live, that thy LORD GOD JESUS CHRIST our KING gave to live and made ~~me~~ Steward of

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Ray Leggett, is a citizen of the State of (name) Tennessee.

b. If the plaintiff is a corporation

The plaintiff, (name) NONE, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) metropolitan Development and Housing Agency, is a citizen of the State of (name) Tennessee. Or is a citizen of (foreign nation) NONE.

b. If the defendant is a corporation

The defendant, (name) NONE, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Bad Steward of LORD JESUS CHRIST Property and building; this is a Universal Law; and Physical and mental abuse. No heat from the main heat unit from November-05-2021 till February-15-2022.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 04-20-2022

Signature of Plaintiff

Printed Name of Plaintiff

William Ray Leggett
William Ray Leggett

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

NONE

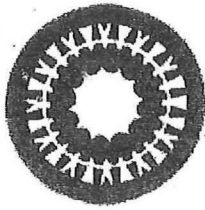
William Ray Leggett
V

metropolitan Development & Housing Agency
These papers are not legal and binding, cause they have the wrong apartment number, my apartment number is 310 not 21045, and Mrs. Tiobanna Jones signature is on these legal papers so it makes not binding cause she quit.

I did not pay rent cause I did have heat from November-05-2021 to February-15-2022, and I had a Professional from Miller and Son heat and air Condition Service name Leon that would have fix my heat, cause their people could fix my heat, they had to call a Professional.

William Ray Leggett
Date: 04-20-2022

I wrote up the main heat 11-05-2021 and heat lamp in bath room on 11-15-2021.



METROPOLITAN DEVELOPMENT AND HOUSING AGENCY

Parthenon Towers * 301 28th Avenue North * Nashville, Tennessee 37203

Telephone device for the deaf (615) 252-8599

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LEGAL NOTICE

03/28/2022

If you want to go court

WILLIAM LEGGETT
301 28TH AVE. N 310
NASHVILLE TN 37203

Tenant ID: 10182462

Unit : 21045

Dear WILLIAM LEGGETT,

According to our records, you have not paid your rent or other charges as outlined on the back page of this letter in the Summary of Outstanding Charges. If you have paid this balance in full, thank you for your payment and please disregard this letter. If you disagree with this balance, please discuss this with your management office immediately.

Because you have not paid all of your balance, you have violated your lease. Please pay the balance in full within thirty (30) days or make some payment arrangement with your management office.

If you do not pay in full within 30 days or make payment arrangements with your management office, we are inviting you to come to a mandatory meeting with Judge Rachel L. Bell, who is the Presiding Judge for the L.E.G.A.C.Y. Housing Resource Diversionary Court (HRDC). This meeting will be to assess your current situation and see if we can come to a pay-and-stay agreement.

This meeting will take place on 04/29/2022, at Levy Place. In a follow-up letter, you will be notified whether your court date will be at 10:00 AM or 1:30 PM; please let your management office know as soon as possible if one of these dates will not work.

If you fail to attend HRDC and do not pay in full within 30 days or by the date of HRDC (whichever is later), your lease is terminated and this is your official notice to vacate. If upon such termination you do not pay all that you owe or you do not move, MDHA will take legal action against you, which may include your eviction. This could cost you more money for legal charges, court costs, and attorney's fees. You will have to pay all money you owe and the legal charges to stop the legal process and keep from being evicted. If you pay what you owe after MDHA takes out a detainer warrant, the detainer warrant will still be served on you. If you question whether any payment made by you will stop the legal process, see your management office.

If you do receive a warrant and have not paid your balance in full, you must go to court on the date and time listed on the warrant. Failure to attend court may result in a default judgment being awarded against you, depriving you of your opportunity to be heard in court.

Mrs. Jones quit

Sincerely,

J. H. Jones
Jiwanna Jones

Parthenon Towers
Property Manager

(615) 252-3732

AM 429 (Rev 03/2022)



MDHA is an Equal Housing provider and does not discriminate based upon race, color, age, national origin, sex, marital status, disability or any other legally protected status in programs, activities or services.

All facilities accessible



I am not paying no late Charges.

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(6)

WILLIAM LEGGETT

21045

10182462

Summary of Outstanding Charges

Date	Type of Charge	Description	Balance Due
11/01/2021	59RENT	RENT 11/1/2021 to 11/30/2021:	334.00
11/06/2021	LATE	Tenant Late Charge Late charge fee:	5.00
11/08/2021	LATE	Tenant Late Charge Late charge fee, 2 days @ \$1.00/day:	2.00
11/22/2021	59RENT	RENT Adj GR, 11/01/2021 to 11/30/2021:	334.00
11/22/2021	59RENT	RENT Adj MI, 11/01/2021 to 11/30/2021:	-334.00
11/30/2021	LATE	Tenant Late Charge Late charge fee, 22 days @ \$1.00/day:	22.00
12/01/2021	59RENT	RENT 12/1/2021 to 12/31/2021:	334.00
12/06/2021	LATE	Tenant Late Charge Late charge fee:	5.00
01/01/2022	59RENT	RENT 1/1/2022 to 1/31/2022:	334.00
02/01/2022	59RENT	RENT 2/1/2022 to 2/28/2022:	334.00
03/01/2022	59RENT	RENT 3/1/2022 to 3/31/2022:	334.00
Total Balance Due			1,704.00

If you disagree with the amount you owe after you have met with the management office you can file a grievance under our normal grievance process. If you agree that you owe this amount you cannot file a grievance.

"TENANT GRIEVANCE PROCEDURE"

3. Informal Settlement of Grievance

Any grievance shall be personally presented, either orally or in writing to the Metropolitan Development and Housing Agency's Asset Management Director's Office, 701 South 6th St, or to the Property Management Office where the complainant resides so that the grievance may be discussed informally and settled without a hearing. A summary of such discussion shall be prepared within a reasonable time and one copy shall be given to the Resident and one retained in the housing resident file. The summary shall specify the names of the participants, dates of meeting, the nature of the proposal, disposition of the complaint and the specific reasons therefore, and shall specify the procedures by which a hearing under Section 4 may be obtained if the Complainant is not satisfied.

4. Procedure to Obtain a Hearing

(a) Request for Hearing - The Complainant shall submit a written request to the Metropolitan Development and Housing Agency for a Hearing either to the Property Management Office where he/she lives or to the Asset Management Director's Office, 701 South 6th St, within 5 working days of the date of the answer to his/her complaint.

The written request shall specify:

(1) The reason for the grievance, and

(2) The action or relief sought.

(b) Failure to Request a Hearing - If the Complainant does not request a Hearing in accordance with this paragraph, then the Metropolitan Development and Housing Agency's disposition of the grievance under Section 3 shall become final. Failure to request a Hearing shall not constitute a waiver by the Complainant of his/her right thereafter to contest the Metropolitan Development and Housing Agency's action in disposing of the complaint in an appropriate judicial proceeding.

(c) Hearing Prerequisite - All grievances shall be personally presented either orally or in writing pursuant to the informal procedure prescribed in section 3 as a condition precedent to a Hearing

RECEIPT		Terry 615-486-1839	
DATE 11-30-21		Miller & Son	
FROM Heating cooling		No.	
Leon works for them 954-914-3754		100.00	
OFOR Service Call		DOLLARS	
Amount of Account	\$100.00	<input checked="" type="checkbox"/> CASH	FROM Leon TO
Amount of Paid		<input type="checkbox"/> CHECK	
Balance Due	\$100.00	<input type="checkbox"/> MONEY ORDER	
		<input type="checkbox"/> CREDIT CARD	BY Ray Leggett

Leon fix the heat lamp in the bath room on, 04-16-2022.

They would fix the heat lamp, cause I ask the office at the Parthenon Towers where I Ray Leggett lives at.

my waitress Leon.
witness

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RECEIPT miller & son		No.
DATE 02-15-22 615-480-1839		
FROM Lees Heating and cooling		\$ 100.00
one hundred		DOLLARS
FOR NO HEAT Evaluation		
Amount of Account	100	<input checked="" type="checkbox"/> CASH
Amount of Paid	100	<input type="checkbox"/> CHECK
Balance Due	0	<input type="checkbox"/> MONEY ORDER
		<input type="checkbox"/> CREDIT CARD
		FROM <i>Ray Seggett</i> TO <i>[Signature]</i>
		BY _____

Terry Miller 615-480-1839

Leon 954-914-3754

I had to call Leon to come back out to check the thermostat to see if they fix the heat, and show me how to operate the thermostat.

Read Page two that states the work order.

turn in on January-26-2022.

Even with a written work order there is a problem with communication with the office at Parthenon Towers.

William Ray Leggett
Want to file lawsuit against
V
Metropolitan Development and
Housing Agency.

For being bad Steward of
LORD GOD JESUS CHRIST
our KING building and
Property, this is a Universal
Law of LORD GOD our FATHER.

And Physical abuse and mental
abuse, this is a Law of the Land.

I would like to keep my rent
money and pay for the main-
tenance and upkeep of the
LORD JESUS CHRIST apartment
that HE made I Ray a
Steward of.